

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of Section 63.71 Application of	)	
	)	
Wave Broadband, LLC for Authority	)	WC Docket No. _____
Pursuant to Section 214 of The	)	
Communications Act of 1934, as amended, to	)	
Discontinue the Provision of Voice Over	)	
Internet Protocol Service in Seattle,	)	
Washington	)	

**SECTION 63.71 APPLICATION**

Wave Broadband, LLC (“Wave”) hereby seeks authorization pursuant to Section 214(a) of the Communications Act of 1934, as amended, 47 U.S.C. § 214(a), and Section 63.71 of the Commission’s rules, 47 C.F.R. § 63.71, to discontinue the provision of certain VoIP services (“Discontinued Services”) on or before August 5, 2019 in the state of Washington.

Wave serves a very small number of subscribers via a legacy platform that Wave acquired following its acquisition of another provider. The total number of customers served by the legacy platform at this time is 60 subscribers. Because the number of subscribers under this legacy platform are *de minimis*, the impact of this discontinuance on the public will be minimal.

To ensure that these customers continue to have access to voice services, Wave intends to offer a functionally equivalent (or better) VoIP service delivered over a different platform (also owned by Wave) to these customers on similar terms of service. As a result, Wave expects that the vast majority of these 60 customers will choose to migrate to the new platform, and continue to receive high-quality voice service. However, should those subscribers choose not to convert to Wave’s VoIP platform, other entities in Washington provide voice services in the affected service area comparable to that service currently used by these customers. Existing voice service

providers in the affected service area include many small carriers and large national carriers such as CenturyLink, Frontier and Vonage.

Wave provides the following information pursuant to Section 63.71 of the Commission's rules:

**I. Information Required by 47 C.F.R. § 63.71(a)(1) – (a)(4)**

**1. Name and Address of Carrier**

Wave Broadband, LLC  
3700 Monte Villa Pkwy, Suite 110  
Bothell, WA 98021

**2. Date of Planned Service Discontinuance**

Wave plans to discontinue the services that are the subject of this Application on or after August 5, 2019.

**3. Points of Geographic Areas of Service Affected**

Wave proposes to terminate the Discontinued Services for a small number of subscribers living in multi-dwelling units in Seattle, Washington. There will be 60 subscribers affected by the discontinuance.

**4. Description of Type of Service Affected**

The Discontinued Services consist of interconnected VoIP services that Wave provides through a legacy platform acquired from a prior transaction.

**II. Notice to Subscribers**

In accordance with 47 C.F.R. §§ 63.71(a) and applicable state law, Wave notified all affected subscribers of the planned discontinuance of the Discontinued Services. Specifically, Wave sent letters via first class U.S. Mail to each of the affected subscribers on July 1, 2019, a sample, redacted copy of which is attached hereto. For subscribers who have consented to

receive notices electronically, Wave also sent an email message regarding the discontinuance on July 3, 2019, a sample, redacted copy of which is attached hereto.<sup>1</sup> In the notice, Wave provided its planned date of discontinuance and notice of the availability of alternative service providers. These notices included all the information required by 47 C.F.R. §§ 63.71(a)(1) – (a)(4) as well as the statement applicable to non-dominant carriers set forth in 47 C.F.R. § 63.71(a)(5)(i).

### **III. Notice to the States and the Dept. of Defense**

In accordance with 47 C.F.R. 63.71(a), Wave mailed a copy of this Application to the Governor of Washington, the Washington Utilities and Transportation Commission, and the Secretary of Defense.

### **IV. Non-Dominant Status**

Wave is a non-dominant carrier in the local and interexchange service markets in these areas.

### **V. Designated Contacts**

Correspondence concerning this Application should be directed to:

K.C. Halm  
Katori Copeland  
Davis Wright Tremaine, LLP  
1919 Pennsylvania Avenue, NW, Suite 800  
Washington, DC 20006  
(202) 973-4287  
[KCHalm@dwt.com](mailto:KCHalm@dwt.com)

(202) 973-4285  
[KatoriCopeland@dwt.com](mailto:KatoriCopeland@dwt.com)

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<sup>1</sup> As a courtesy, Wave notified end users that may be using this service but are not currently paying for the service. Wave does not have any contact information for these end users, other than the telephone number on file. Absent specific guidance on obligations to the company's non-paying end users, Wave has developed a plan to reach these end users via direct contact to the telephone number of record. Wave began contacting these end users on July 3, 2019.

WHEREFORE, Wave respectfully requests that the Commission authorize the discontinuance of the VoIP services described herein on or before August 5, 2019, or 31 days after the Commission release public notice of this filing, whichever date is earlier.

Respectfully Submitted:

WAVE BROADBAND, LLC



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By: K.C. Halm  
Katori Copeland  
Davis Wright Tremaine, LLP  
1919 Pennsylvania Avenue, NW, Suite 800  
Washington, DC 20006  
Telephone: (202) 973-4287  
Facsimile: (202) 973-4499

*Counsel for Wave Broadband, LLC*

Dated: July 12, 2019

cc: Gov. Jay Inslee, Governor of Washington  
Washington Utilities and Transportation Commission

Secretary of Defense, Pentagon  
Attn: Special Assistant for Telecommunications  
Washington, DC 20301



## IMPORTANT NOTICE: Changes to your Wave G phone service

July 1, 2019

Dear «First\_name»,

The VoIP phone service previously provided by CondoInternet, now Wave G, in Seattle, WA, requires upgrades to enable us to support you as a customer and deliver standard phone features.

**We will be shutting down current phone system equipment on August 5, 2019. In order to ensure your phone service continues to operate properly, new equipment must be installed in your home before August 5, 2019.**

Following the upgrade, you will be able to keep your phone number; however, your monthly rate will change to be consistent with the new service, increasing to \$20/month, plus taxes and fees.

The upgraded Wave G phone service will provide a crystal-clear connection and unlimited calling throughout the U.S. and Canada. Plus, you'll receive enhanced voicemail, call waiting, caller ID, Nomorobo compatibility, and the Wave Cloud Phone app, which enables you to use your home phone number with any smartphone or tablet connected to the internet.

Keeping your service and phone number will require a brief in-home appointment to install the required equipment. **Please contact our care team at 1-844-779-2834 to schedule your installation appointment.**

If you do not wish to keep your service or phone number, no action is required and **your service will be disconnected on August 5, 2019.**

You may also choose to port your number to an alternative provider. A list of alternate service providers may be found online or in the front of your local telephone directory.

Please note: The FCC will normally authorize this proposed discontinuance of service unless it is shown that customers would be unable to receive service or a reasonable substitute from another carrier or that the public convenience and necessity is otherwise adversely affected. If you wish to object, you should file your comments as soon as possible, but no later than 15 days after the Commission releases public notice of the proposed discontinuance. You may file your comments electronically through the FCC's Electronic Comment Filing System using the docket number established in the Commission's public notice for this proceeding, or you may address them to the Federal Communications Commission, Wireline Competition Bureau, Competition Policy Division, Washington, DC 20554, and include in your comments a reference to the § 63.71 Application of Wave Broadband, LLC. Comments should include specific information about the impact of this proposed discontinuance upon you or your company, including any inability to acquire reasonable substitute service.

Thank you for being a Wave customer.

Sincerely,

Wave



**From:** [customerservice@wavebroadband.com](mailto:customerservice@wavebroadband.com) <[customerservice@wavebroadband.com](mailto:customerservice@wavebroadband.com)>

**Sent:** Monday, July 1, 2019 8:54 AM

**To:** [REDACTED]

**Subject:** IMPORTANT NOTICE: Changes to your Wave G phone service

[View it in your browser.](#)



## IMPORTANT NOTICE

Dear [REDACTED]

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Thank You,  
WAVE CUSTOMER SERVICE TEAM

You are receiving this e-mail as a current subscriber to Wave services.  
If you no longer wish to receive these emails, simply UNSUBSCRIBE.

Wave, 401 Parkplace Center, Suite 103 Kirkland, WA 98033  
1-866-WAVE-123

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